

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

Alonzo Workman,
Darlene Workman,

Debtors.

Case No. 22-12357-pmm

Chapter 7

Debtors' Motion to Approve Next Friend

AND NOW, Debtors Alonzo Workman and Darlene Workman, by and through their attorney, state as follows:

1. The Court may approve a Next Friend to represent the interests of a debtor who is unable to do so themselves under certain circumstances. Fed. R. Bankr. P. 1004.1; 11 U.S.C. § 109(h)(4); *Gardner v. Parson*, 874 F.2d 131, 139 (3d Cir. 1989); Pa. R. Civ. P. 2051.

2. Joint Debtor Darlene Workman died on January 13, 2024.

3. Debtor Alonzo Workman is elderly and grieving the loss of his wife. The bankruptcy process, especially the meeting of creditors, is intimidating and scary for many debtors. Although Mr. Workman is competent to testify at the meeting of creditors, his family would prefer that he has someone with him during the meeting to help him if necessary.

4. The Court should approve Victoria Workman, Alonzo Workman's daughter, as next friend for the limited purpose of attending the meeting of creditors with Mr. Workman.

5. The Court indicated at a February 28 hearing that it would be inclined to grant this motion under the circumstances.

NOW, THEREFORE, the Debtors ask this Court to grant relief in the form of order attached and to grant such other relief in their favor as may be necessary and proper under the law.

Date: March 8, 2024

CIBIK LAW, P.C.
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